



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

August 17, 2021

**BY ECF**

The Honorable Sidney H. Stein  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**MEMO ENDORSED**

**Re: *United States v. Ying Sun et al.*, No. 21 Cr. 343 (SHS)**

Dear Judge Stein:

An initial conference in the above-captioned matter is scheduled for August 19, 2021. The Government writes, with the consent of defense counsel, to request an adjournment of the conference for approximately 30 days.

On July 21, 2021, defendants Ying Sun, Frank Liu, Dielong Wu, Larry Lai, and Steven Woo were arrested. Defendants Jian Wang and Jie Lin remain at large. Wu and Lai were presented in this District, and Sun, Liu, and Woo were presented in the Central District of California. Wu, Lai, Liu, and Woo have been released on bail. Sun remains detained pending transfer to the Southern District of New York, which is expected to occur at the beginning of September.

The Government is in the process of arranging for Liu and Woo to be appointed counsel and presented in this District, which the Government is seeking to do remotely to avoid the need for travel during the ongoing COVID-19 pandemic, especially in light of the resurgent Delta variant. The Government therefore respectfully requests that the Court adjourn the conference for approximately thirty days to permit the defendants who were arrested in California to be appointed counsel and/or to be presented in this District, as well as for the parties to begin or continue preliminary discussions regarding the substance of the case, discovery materials to be produced, and possible pretrial resolution.

In the event that the Court grants the requested adjournment, the Government respectfully requests that the Court exclude time under the Speedy Trial Act, from August 19, 2021 to the date that the conference is rescheduled for the reasons stated above. The Government submits that the ends of justice served by the continuance outweigh the best interests of the public and the defendants in a speedy trial. *See* 18 U.S.C. § 3161(h)(7)(A).

I have communicated with defense counsel for arrested defendants, including those counsel appointed for the purpose of presentment in the Central District of California, who have all consented to the above requests.

Respectfully submitted,

AUDREY STRAUSS  
United States Attorney

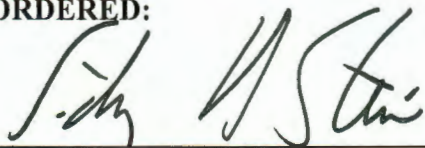
By:   
Brett M. Kalikow  
Assistant United States Attorney  
(212) 637-2220

cc: Yuan (Bill) Li, Esq. and Michael D. Walsh, Esq. (via ECF and Email)  
Robert Rexrode, Esq. (via ECF and Email)  
Xavier R. Donaldson, Esq. (via ECF and Email)  
David Touger, Esq. (via ECF and Email)  
Meghan Blanco, Esq. (via ECF and Email)

**The conference is adjourned to September 30, 2021, at 4:00 p.m. The time is excluded from calculation under the Speedy Trial Act from today until September 30, 2021. The Court finds that the ends of justice served by this continuance outweigh the best interests of the public and the defendants in a speedy trial pursuant to 18 U.S.C. Sec. 3161(h)(7)(A).**

**Dated: New York, New York  
August 17, 2021**

**SO ORDERED:**

  
\_\_\_\_\_  
Sidney H. Stein, U.S.D.J.